

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

IN RE:

GRACE JONES

Debtor

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Case No.: 08-18708-NVA

Chapter 13

**MOTION TO DISMISS CASE FOR  
MATERIAL DEFAULT IN PLAN PAYMENTS**

Gerard R. Vetter, Chapter 13 Trustee, files this Motion to Dismiss Case and states as follows:

1. The plan in this Chapter 13 case was confirmed by Order entered October 27, 2008.
2. The Debtor is in material default under the terms of the plan by having failed to maintain the payments required by the plan. The default in payments now totals \$1,652.00, approximately 5 months.
3. The failure of Debtor to make plan payments has created an unreasonable delay prejudicial to the creditors in this case.
4. For the reasons stated, cause exists under 11 U.S.C. §1307(c) to dismiss this case.

WHEREFORE, the Trustee requests this Court to dismiss this case, and to grant such other relief as is just.

/s/Gerard R. Vetter  
Gerard R. Vetter, Trustee  
Chapter 13 Trustee  
100 S. Charles Street, Suite 501  
Tower II  
Baltimore, MD 21201  
Phone: (410) 400-1333  
Fax: (410) 400-1301  
E-mail: catrinab@grvch13.com

**TO THE DEBTOR; RESPONSES OR OBJECTIONS TO THIS MOTION TO DISMISS MUST BE FILED WITHIN 21 DAYS FROM THE DATE OF THE CERTIFICATE OF SERVICE BELOW. ANY RESPONSE OR OBJECTION MUST INCLUDE THE FACTS AND LEGAL GROUNDS ON WHICH THE RESPONSE OR OBJECTION IS BASED. ANY RESPONSE OR OBJECTION MUST BE FILED WITH THE BANKRUPTCY COURT, WITH A COPY SERVED ON THE CHAPTER 13 TRUSTEE, GERARD R. VETTER, 100 S. CHARLES STREET, SUITE 501, TOWER II, BALTIMORE, MARYLAND 21201, E-MAIL [catrinab@grvch13.com](mailto:catrinab@grvch13.com). THIS CASE MAY BE DISMISSED WITHOUT FURTHER ORDER OR NOTICE IF NO TIMELY OBJECTION IS FILED. THE COURT IN ITS DISCRETION MAY CONDUCT A HEARING OR DETERMINE THE MATTER WITHOUT A HEARING REGARDLESS OF WHETHER AN OBJECTION IS FILED.**

**CERTIFICATE OF SERVICE**

I hereby certify that on this May 26, 2010, to the extent that the following persons were not served electronically via the CM/ECF system, I caused a copy of the pleading above referenced to be sent, by First Class U.S. Mail, postage prepaid to:

Grace Jones  
2627 Marbourne Avenue  
Baltimore, MD 21230

Jeffrey M. Sirody, Esq.  
1777 Reisterstown Road  
Suite 360 E.  
Baltimore, MD 21208  
Counsel for Debtor

*/s/ Gerard R. Vetter*  
Gerard R. Vetter